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IN THE

Supreme Court of the United States

ELK GROVE UNIFIED SCHOOL DISTRICT,
AND DAVID W. GORDON, SUPERINTENDENT,
Petitioners,

—v.—

MICHAEL A. NEWDOW, ET AL.,
Respondents.

ON WRIT OF CERTIORARI TO THE UNITED STATES
COURT OF APPEALS FOR THE NINTH CIRCUIT

BRIEF AMICUS CURIAE OF BUDDHIST TEMPLES, CENTERS AND ORGANIZATIONS REPRESENTING OVER 300,000 BUDDHIST AMERICANS IN SUPPORT OF RESPONDENTS

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QUESTION PRESENTED

Whether the Establishment Clause permits public schools to conduct patriotic classroom exercises that declare the United States to be a monotheistic nation.

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INTEREST OF AMICI CURIAE[1]

Amici Curiaė Nebraska Zen Center et al., are Buddhist temples, churches, centers and other organizations from a cross-section of Buddhist communities, and from every geographical region in the United States. As adherents to a non-theistic religion, Buddhist Americans have a direct interest in this case. Several of the *Amici* are individual member temples of larger Buddhist networks whose origins in the United States date to the 1800s, including the Buddhist Churches of America and the Honpa Hongwanji Mission in Hawaii. Other *Amici* are affiliates of large international Buddhist networks such as the Foundation for the Preservation of the Mahayana Tradition and the Nipponzan Myohoji. Several of the *Amici* are local communities of Buddhist adherents. One of the *Amici*, Soka Gakkai International-USA, has 87 centers and over 330,000 members in the United States. Further information about the *Amici* is provided in the Appendix.

Amici are:

- Billings Dharma Center, Billings, Montana
- Blue Mountain Lotus Society, Harrisburg, Pennsylvania
- Border Zen Center, El Paso, Texas
- Cleveland Buddhist Temple, Euclid, Ohio
- Ekoji Buddhist Temple, Fairfax Station, Virginia
- A Few Simsapa Leaves Buddhist Center, Walla Walla, Washington

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[1] All parties have consented to the filing of this brief through letters filed with the Clerk of Court. No counsel for a party authored this brief in whole or in part. No person or entity, other than the *Amici*, their members or counsel, have made a monetary contribution to the preparation or submission of this brief.

- Fresh Breeze Mindfulness Sangha, Baltimore, Maryland
- Greater Boston Buddhist Cultural Center, Boston, Massachusetts
- Honpa Hongwanji Hawaii Betsuin, Honolulu, Hawaii
- Kurukulla Center for Tibetan Buddhist Studies, Medford Massachusetts
- LamRim Buddhist Center, Chestnut Hill, Massachusetts
- Mansfield Zen Sangha, Mansfield, Ohio
- Nebraska Zen Center, Omaha, Nebraska
- Nipponzan Myohoji - Atlanta Dojo, Atlanta, Georgia
- Ozark Zen Center, Fayetteville, Arkansas
- Palo Alto Buddhist Women's Association, Palo Alto, California
- Seabrook Buddhist Temple, Seabrook, New Jersey
- Soka Gakkai International-USA, Santa Monica, California
- Unitarian Universalist Buddhist Fellowship, Albany, New York
- Unitarian Universalist Buddhist Group of Richmond, Richmond, Virginia
- Village Zendo, New York, New York
- Wat Richland Buddhavanaram, Richland, Washington
- Wat Washington Buddhavanaram, Auburn, Washington

SUMMARY OF ARGUMENT

When children from Buddhist homes across the United States recite the Pledge of Allegiance, they utter a phrase that is inconsistent and incompatible with the religious beliefs and ethical principles they are taught by their parents, by other adults in their communities, and by their teachers at after school religious programs and at Sunday Dharma school. That phrase is that this is a nation "under God." Although these children may wish to say the Pledge, express their patriotism, and state aloud their commitment to this "indivisible" country and the values of "liberty and justice for all" represented by the flag, they can only do so by referring to a deity and a particular religious paradigm that is at odds with their Buddhist beliefs. Unlike the religious group considered by the Court in *W. Va. State Bd. of Educ. v. Barnette*, 319 U.S. 624 (1943), Buddhism does not prohibit Buddhists from committing their allegiance to the United States (indeed, numerous Buddhist-Americans have given their lives fighting for this country). Thus, when viewed from the perspective of a Buddhist, there is no question that teacher-led recitation of the Pledge in public secondary and elementary schools violates the very "touchstone of Establishment Clause jurisprudence: Neither a State, nor the Federal Government can pass laws which aid one religion, aid all religions, or prefer one religion over another." *Lee v. Weisman*, 505 U.S. 577, 600 (1992) (Blackmun, J., joined by Stevens and O'Connor, JJ., concurring) (citing *Everson v. Bd. of Educ. of Ewing*, 330 U.S. 1 (1947)).

The United States and the *Amici* Senators and Congressmen fail to mention Buddhism and this country's 3,000,000 – 4,000,000 Buddhists in their briefs, although they discuss the role of other religions in shaping our country's history. Buddhism has a rich history in the United States, and Buddhism is growing quickly in this country. Yet, when public school teachers lead children in reciting the Pledge, the

unmistakable message conveyed by the government is that Buddhism is an outcast religion and that Buddhist students "are outsiders, not full members of the political community, and [there is] an accompanying message to adherents that they are insiders, favored members of the political community." *Santa Fe Indep. Sch. Dist. v. Doe*, 530 U.S. 290, 309-10 (2000) (quoting *Lynch v. Donnelly*, 465 U.S. 668, 688 (1984) (O'Connor, J., concurring)).

It is irrelevant that recitation of the Pledge in public elementary and secondary schools is voluntary because the nature of the exercise itself creates a constitutionally unacceptable dilemma for Buddhist schoolchildren. Reciting the Pledge is incompatible with Buddhist beliefs because it affirms loyalty to a nation "under God." However, if Buddhist schoolchildren adhere to their religious beliefs and remain silent, they are denied the opportunity for patriotic expression by reciting the Pledge. They also run the risk of being stigmatized and branded as unpatriotic. Whether or not they participate in the Pledge, Buddhist schoolchildren are confronted with a vision of their country that is "under God," and therefore irreconcilable with their religion. The dilemma for Buddhist schoolchildren created by the Pledge constitutes coercion and the endorsement by the government of a particular religion in violation of the Establishment Clause under the Court's precedents, particularly *Lee* and *Santa Fe*.

The Pledge cannot be justified as mere "ceremonial Deism," nor can it be characterized as a history lesson, nor can it be dismissed as a *de minimis* affront to Buddhists that they must tolerate because other Americans hold monotheistic beliefs. The 1954 amendment to the Pledge, however well-intentioned, was a mistake that unconstitutionally entwined the government with Judeo-Christian monotheism and breached the "wall of separation between church and State." *Reynolds v. United States*, 98 U.S. 145, 164 (1878).

The very freedoms that the American flag represents, and the very sense of national unity that teacher-led recitation of the Pledge is intended to foster, are undermined when a religious concept not shared by all Americans is injected into our great patriotic oath.

ARGUMENT

I. FACTUAL BACKGROUND

A. Buddhism is a Major World Religion with Millions of Adherents in the United States

The Court has recognized that Buddhism is one of the world's major religions, "established 600 B.C., long before the Christian era." *Cruz v. Beto*, 405 U.S. 319, 322 (1972).[2] The first major influx of Buddhists into the United States dates to the 1849 Gold Rush, when a significant number of immigrants from China arrived in California. One of the first Buddhist temples in the United States was established in San Francisco in 1853.[3] A different Buddhist tradition in the United States dates to the 1870s, when large numbers of Japanese immigrants began to arrive on the West Coast. By 1900, the Japanese community in California had grown to

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[2] Buddhism ranks fourth in number of adherents among the world's religions, with 361,985,000 Buddhists worldwide. *World Almanac* 638 (2003) (providing figures for mid-2001) (citing *Encyclopedia Britannica Book of the Year*) (2000). Buddhism is the predominant religion in Japan, Thailand, Tibet, Cambodia, Myanmar, Bhutan, Sri Lanka, Laos, and Vietnam, with over 50% of the population of these countries identifying themselves as Buddhists. There are over 100,000,000 Buddhists in China. *See* http://www.adherents.com (last updated March 23, 2000).

[3] Richard Hughes Seager, *Buddhism in America* 159 (1999).

over 24,000, substantial enough to warrant establishing the first Buddhist Mission from Japan to North America.[4]

In the 1840s, Ralph Waldo Emerson drew comparisons between Buddhism and the American transcendentalist movement. One of the first Americans to translate Buddhist scripture into English was Henry David Thoreau, who once wrote: "Some will have bad thoughts of me, when they hear their Christ named beside my Buddha."[5] Buddhism and Buddhist philosophy have inspired American religious, literary and cultural movements from the Theosophical Society founded in New York City in 1873, to the Beat writers of the 1950s, to the spread of Zen meditation centers in the 1970s, to popular films about Tibet and the life of the Dalai Lama in the 1990s.

Statistics on the number of Buddhists in the United States today vary. According to the *World Almanac*, there were 2,777,000 Buddhists in North America as of mid-2001.[6] Other sources place the figure at 3,000,000-4,000,000 Buddhists in the United States, the most in any country outside of Asia.[7] In a widely cited study published by the City University of New York in 2001, 1,082,000 American adults over the age of 18 identified themselves as Buddhists, almost triple the number as 1990.[8] There are now 1,960

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[4] Tetsuden Kashima, *Buddhism in America: The Social Organization of an Ethnic Religious Institution* (1977).

[5] Van Biema, David, *Buddhism in America: An Ancient Religion Grows Ever Stronger Roots in a New Word*, Time (1997).

[6] *World Almanac* 638 (2003).

[7] Seager, *supra*, at 11 (citing Martin Baumann, *The Dharma Has Come West: A Survey of Recent Studies and Sources*, 4 J. of Buddhist Ethics (1997) *at* http://jbe.gold.ac.uk/4/baum2.html).

[8] Dr. Ariela Keysar et al., *American Religious Identification Survey* (The Graduate Center, City University of New York)

Buddhist centers in the United States.[9] The rapid increase in the number of Buddhists in the United States in recent years has generated significant interest among scholars in the field of American religious history.[10]

Although many Americans have converted to Buddhism, most Buddhists in the United States are recent immigrants who began to arrive in this country in large numbers around 1975 from China and southeast Asia. Some arrived as war

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(2001), *at* http://www.gc.cuny.edu/studies/key_findings.htm. The number of Buddhist Americans under the age of 18 is not reported in the survey. According to the survey, the number of adult Buddhists in the United States is approximately the same as the number of adult Muslims, and approximately 40% of the number of Jewish Americans. These statistics do not include the millions of Americans whose religious and spiritual beliefs are inspired and influenced by Buddhist teachings and meditation practices.

[9] The Pluralism Project Directory of Religious Centers (Harvard University), *at* http://www.pluralism.org (last visited Feb. 9, 2004).

[10] In addition to Professor Seager's book (see note 3 above), major studies in the field of American Buddhism published over the past 12 years include: *American Buddhism: Methods and Findings in Recent Scholarship* (Duncan Ryuken Williams & Christopher Queen eds., 1999); *The Faces of Buddhism in America* (Charles S. Prebish & Kenneth Kenichi Tanaka eds., 1998); Rick Fields, *How the Swans Came to the Lake* (1992); Janet Hurst, *Nichiren Shoshu Buddhism and the Soka Gakkai in America: The Ethos of a New Religious Movement* (1992); Paul Numrich, *Old Wisdom in the New World: Americanization in Two Immigrant Theravada Temples* (1996); Charles S. Prebish, *Luminous Passage: The Practice and Study of Buddhism in America* (1999); Thomas Tweed, *The American Encounter with Buddhism, 1844-1912* (1992); Helen Tworkov & Natalie Goldberg, *Zen in America: Five Teachers and the Search for American Buddhism* (1994).

refugees from Vietnam, Cambodia, and Laos, and many came from China, Tibet, Taiwan, Thailand and South Korea, but all have come to this country seeking the blessings of liberty and the pursuit of a better life for themselves and their families. Approximately 2,200,000 to 3,200,000 Buddhist Americans are recent immigrants or children of recent immigrants from these Asian countries.[11] According to the City University of New York 2001 survey, the racial and ethnic breakdown of Buddhists in the United States is as follows: Asian 61%; Caucasian 32%; African-American 4%; Hispanic 2%; other 1%.[12]

B. American Buddhism Consists of Three Main Communities.

Scholars generally divide Buddhists in this country into three broad groupings: (1) New immigrants; (2) Asian-Americans, mostly of Japanese and Chinese descent, who have practiced Buddhism in the United States for four to five generations; and (3) converts to Buddhism among other Americans.[13] *Amici* include Buddhist congregations and organizations from all three communities. While all three groups share certain core Buddhist beliefs, their distinct experiences and histories are also relevant to the issue presented in this case:

1. New Buddhist Immigrants

This group is "composed of immigrant and refugee Buddhists from a range of Asian nations who are in the process of transplanting their received traditions to this country,"[14] and includes—

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[11] Seager, *supra*, at 11.

[12] Keysar, *supra*, ex. 13.

[13] *See, e.g.*, Seager, *supra* at 9-10.

[14] *Id.* at 10.

- Over 750,000 ethnic Chinese immigrants who have established more than 150 Chinese Buddhist organizations in the United States.[15]
- Over 500,000 Vietnamese immigrants who have arrived in the United States since the fall of Saigon in 1975. There are now more than 150 Vietnamese Buddhist temples across the United States.[16]
- Between 500,000 and 750,000 immigrants who adhere to the Theravada school of Buddhism predominant in Southeast Asia (other than Vietnam), from Thailand, Sri Lanka, Cambodia, Myanmar, and Laos. One scholar has identified 150 organizations in the United States functioning as Theravada temples in more than 30 states, but mostly in California, Texas, New York, and Illinois.[17]
- South Korean immigrants, a significant number of whom identify themselves as Buddhists. There are Korean Buddhist temples in Los Angeles, New York, Chicago and Atlanta.[18]

The experience of these recent immigrants mirrors that of other immigrant groups that have come to this country since the early Nineteenth Century. At first, these communities struggled with basic challenges such as "social adjustment, economic survival, and the emotionally complex processes involved in Americanization," and Buddhist temples served as central gathering points for these communities as well as religious sanctuaries.[19] As time has passed, these communi-

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[15] *Id.* at 160.

[16] *Id.* at 174.

[17] *Id.* at 138.

[18] *Id.* at 168

[19] *Id.*

ties have become increasingly concerned with second-generation issues and have established after-school Buddhist religious programs, Buddhist summer camps, and Sunday Dharma schools. As in Jewish, Greek Orthodox and many other communities across this country, religion plays a vital role in the coherence of their communities and the maintenance of their cultural heritage. Unfortunately, the experience of these recent immigrants also mirrors that of other immigrant groups in the suspicion and resentment with which their arrival was greeted. Buddhist temples were the target of bombings and shootings in the 1980s, and these recent immigrants have faced the same type of anti-Asian racial, ethnic and religious violence that Japanese and Chinese immigrants faced in the early 1900s.[20]

2. Established Asian-American Buddhist Communities

This group is comprised primarily of Americans of Japanese and Chinese ancestry "who have practiced Buddhism in this country for four or five generations."[21] They have established religious institutions such as the Buddhist Churches of America ("BCA"), a body that traces its origins to 1899 but that was renamed during World War II, at the suggestion of Japanese Americans in a war-time internment camp "to emphasize the institution's Americanness."[22] From the violence against Japanese buildings and businesses in California during the early 1900s and the formation of the Asiatic Exclusion League in 1905, to the internment of 111,170 Japanese Americans during World War II,[23] this

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[20] *Id.* at 142.

[21] *Id.* at 10.

[22] *Id.* at 57.

[23] Of the 111,170 Japanese-Americans who were interned, 61,719 were Buddhists. *Id.*

community has struggled with racism and ethnic and religious discrimination throughout its 100-year history in this country.[24]

3. The Convert Buddhist Community

Although popular interest in Buddhism and Buddhist philosophy has waxed and waned in America over the past half-century, Buddhism is a profound personal commitment, not a fad or passing fancy, for a large and growing number of Americans. In a 1997 article in *Time* entitled, "Buddhism in America: An Ancient Religion Grows Ever Stronger Roots in a New World," converts to Buddhism are described as a "vibrant, if small, U.S. community of believers" who are creating a uniquely American form of Buddhism that combines traditional Buddhist beliefs and practices with distinctly American traits and values. The community includes "some 100,000 American-born Buddhists, many of whom have been practicing for decades," and who have established well over 1,000 English-language Buddhist teaching centers in the United States.

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[24] The fact that the Pledge affirms loyalty to a country "under" a deity that they do not worship is especially poignant for those Buddhist-American families who have lost loved ones fighting for the United States. One of the more noteworthy examples was the incident during World War II in which a Japanese-American unit that included numerous Buddhists, the 100th Battalion and 442nd Regimental Combat Team, sustained numerous casualties while rescuing 211 members of the 36th Division's "Lost Battalion" which hailed from Texas. For its size, this Japanese-American Combat Team was the most decorated unit in American history. Gregg K. Kakesako, *Film to Tell Tale of 442nd, 100th*, Honolulu Star-Bulletin, Nov. 23, 2003, *available at* http://starbulletin.com/2003/11/23/news/story7.html.

It is fitting testimony to the religious pluralism protected and encouraged by the Establishment and Free Exercise Clauses that millions of Americans today observe, practice and share the ancient religion of Buddhism.

C. Non-Theism is a Central Tenet in Buddhism

1. The Teachings of Buddhism

A complete description of Buddhism and the many schools of Buddhist thought that have emerged over the course of Buddhism's 2,500 year history is beyond the scope of this legal brief, but it is necessary to summarize certain core beliefs shared by all Buddhists in order to explain how the phrase "under God" is incompatible with Buddhism.

Although there are different accounts of the Buddha's early life, Buddhists accept the historical existence of the individual who became known as the Buddha. Scholars generally agree that the Buddha was born in or around 563 B.C.E. in an area that is today southern Nepal, that his name was Siddhartha, and that he belonged to the Gautama clan or family.[25] In the traditional account of his childhood, Siddhartha's father was a king who sheltered him, but as a young man Siddhartha abandoned his life as a prince and spent six years living among a band of ascetics.

The central, defining historical moment for Buddhists – roughly comparable to Abraham's receipt of the "still small voice" of God to Jews, the crucifixion and resurrection of Jesus Christ to Christians, and the delivery of Allah's words to the prophet Mohammed to Muslims – occurred when Siddhartha one day left his companions, sat down under a tree and determined that he would not rise until he had found the spiritual insight that he had been seeking. What

[25] Donald S. Lopez, Jr., *The Story of Buddhism* 37 (2001).

Siddhartha experienced during that night is the topic of various stories and theories that have been debated for centuries, but all Buddhists agree that Siddhartha made a series of discoveries that night which transformed him into the "Buddha," which means an "awakened one" or the "enlightened one."

Although the Buddha's awakening did not involve an encounter with "God," a god, or the receipt of truths, wisdom or a calling from an external being or deity, the awakening of the Buddha under the legendary Bodhi tree, under a full moon in the month of May, is revered as *sacred* to all Buddhists. As described by one of this country's foremost Buddhist scholars:

> The enlightenment of the Buddha . . . was not the reception of a divine mission to spread the "Truth" of "God" in the world. The Buddha's enlightenment was rather a human being's direct, exact and comprehensive experience of the final nature and total structure of reality. It was the culmination for all time of the manifest ideals of any tradition of philosophical exploration or scientific investigation. . . .[26]

Indeed, the fact that the awakening was accomplished by a *human*, and did not involve the intervention of "God" or knowledge imparted by something external to or "other than" Siddhartha, is central to Buddhism:

> No matter how preposterous it may seem to us at first, it is necessary to acknowledge the Buddha's claim of the attainment of omniscience in enlightenment. *It is foundational for every form of Bud-*

[26] Robert A.F. Thurman, *Essential Tibetan Buddhism* 9 (1995).

> *dhism . . . [but is] damnable sacrilege for traditional theists . . . .*[27]

After the Buddha's awakening, he began to teach the "Dharma," which is generally translated as "doctrine" or "natural law." Accompanied by his disciples, the Buddha taught the Dharma over the ensuing forty-five years, until he died at the age of 80.

The Dalai Lama has summarized the Buddha's teaching as follows: "The quintessence of Dharma is that one has understood in oneself the causes of one's own *duhkha* [*i.e.*, suffering] thereby becoming able to tell others of these *duhkha*-causes [*i.e.*, the causes of suffering]."[28] Three aspects of the Dharma are especially relevant in this case because they illustrate the dilemma faced by Buddhist schoolchildren in reciting the phrase that this is a nation "under God:" (A) the very goal of Buddhism is to cultivate a state of awareness that transcends all dualistic conceptualization, including the existence or non-existence of "God;" (B) a basic Buddhist ethical teaching is to refrain from untrue utterances, and Buddhist schoolchildren who do not believe in God must violate this teaching if they are to recite the Pledge and express their loyalty to a nation "under God;" and (C) the moral precepts intended to be conveyed in the 1954 amended version of the Pledge are incompatible with basic Buddhist ethical teachings.

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[27] *Id.* (emphasis added).

[28] His Holiness Tenzin Gyatso, the Fourteenth Dalai Lama of Tibet, *Opening of the Wisdom-Eye* 16 (1966). As the Court is no doubt aware, the Dalai Lama was awarded the Nobel Peace Prize in 1989, has written several books about Buddhism that are widely read in this country, and thousands of Americans regularly attend the Dalai Lama's speeches and public appearances in the United States.

2. Buddhism Does Not Embrace Monotheism or the Concept of "God"

The word "God" as it is used in the Pledge *cannot* be stretched, construed or contorted to encompass the Buddha or Buddhism, and the importance of *non-theism* in Buddhism cannot be understated. For example, the Mahayana branch of Buddhism embraces non-duality and rejects the notion of a dichotomous universe in which there is a "Creator" separate from creation, and where nations can exist "under God:"

> Mahayana Buddhists . . . expressed this unified view of reality in terms of nonduality. There was neither nirvana nor samsara, this world or another; all such distinctions rested on concepts, ideas, and discriminations considered illusory. Philosophers expressed this nondualism in terms of *shunyata* or emptiness, the idea that everything in the universe is devoid of fixity and permanence. But emptiness also conveys the idea that beyond illusory distinctions is the blissful clarity of universal wisdom and compassion.[29]

Indeed, one of the very goals of all schools of Buddhism is to reach a state of mind in which there is a profound experience of the ultimately singular and unified nature of reality. The Dalai Lama has described that realization as "the supreme wisdom."[30] The Buddhist concept of nonduality, that all things, all beings, and all events constitute a singular reality in which Buddha mind is present and God neither is nor is not, is articulated in the Chinese Mahayana Buddhist proverb that "we rise and fall as one living body."

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[29] Seager, *supra*, at 24-25.

[30] Dalai Lama, *supra*, at 94.

For Buddhists, the concept of "God" interferes and clashes with this essential goal of their faith: To experience reality mindfully and with direct insight into the non-dualistic nature of existence, free of any thought of, fixation on, or prayer to, "God," an "Almighty," a "Creator," or any notion of a Supreme Being. The Buddha repeatedly warned his followers that contemplating "God" or the existence of a "Creator," would lead the observant Buddhist into "a jungle, a wilderness, a puppet-show, a writhing and a fetter, coupled with misery, ruin, despair, and agony."[31] The concept of "God" represents the type of illusory thought or habit of mind that Buddhism cautions *against*. Instead of thinking about "God," Buddhists are taught to "view the world simply, directly, with the perception achieved in insight meditation."[32]

Thus, when schoolchildren from Buddhist homes recite the words in the Pledge that this is "one Nation under God," they not only voice the name of a deity from a set of religions that is different from their own, but they articulate a religious concept that is irreconcilable with the teachings of their religion and the "supreme wisdom" that is their religion's goal.

3. Buddhist Ethical Teachings are Inconsistent with the Notion of God as a Moral Force and Prohibit Untrue Utterances

By adding "under God" to the Pledge, Congress wished to "acknowledge the dependence of our people and our Government upon the moral directions of the Creator," and to recognize that surviving the challenges of "selfishness," and "immorality" require "the help of a power greater than

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[31] Lopez, *supra*, at 34.

[32] Michael Carrithers, *Buddha: A Very Short Introduction* 72 (1983).

our own." H.R. Rep. No. 83-1693 (1954), *reprinted in* 1954 U.S.C.C.A.N. 2339, 2340; 100 Cong. Rec. 7758 (1954) (statement of Rep. Bolton). This concept of "God" as a moral force that shapes the destiny of nations reflects a Judeo-Christian belief system that profoundly clashes with the central tenets of Buddhism.

Like the Judeo-Christian system, Buddhism teaches compassion for all living things, exalts loving-kindness, and instructs that one must refrain from killing, stealing, lying, and other misdeeds.[33] But Buddhism rejects the notion that these moral directions spring from "God," or that "immorality" can only be overcome by appealing to "a power greater than our own." Rather, the central concepts of Buddhist ethical teaching are karma and rebirth. For Buddhists, the term "karma" means an individual's intentions, actions and the consequences of an individual's actions.[34] As the Dalai Lama explains, Buddhists are taught that there can be no spiritual progress without adhering to Buddhist ethical principles: "Since the karma made by us in the present will certainly lead to the experience of future lives, we should prepare for them now. How can we do so? By aiming at a mind free from mental defilement or stains while acquiring virtues."[35]

To Buddhists, human suffering and the events of human history have nothing to do with the will of an "Almighty" (the word describing "God" used by President Eisenhower),[36] but are caused solely by the thoughts and acts of human beings. The laws of karma and rebirth are part of the

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[33] Lopez, *supra*, at 48-49.

[34] Carrithers, *supra*, at 66.

[35] Dalai Lama, *supra*, at 30.

[36] 100 Cong. Rec. 8618 (1954).

very fabric of the universe, and neither the Buddha nor any "God" has the power to suspend or influence them.

One of the central ethical lessons taught in Buddhism, like other religions, is to speak truthfully. Among the Buddha's first expressions of the Dharma after his enlightenment was the teaching of the "Noble Eightfold Path," comprising eight principles of inner and outer conduct that are essential for spiritual progress. The third such principle, called "Right Speech," calls for straightforward and truthful speech and does not excuse prevarication, half-truths or convenient lies.[37] This principle also does not excuse failure to speak when it is timely to speak. "Right Speech" and other ethical principles are a very important part of the curriculum taught to children in Buddhist after-school religious programs and Sunday Dharma school.

Thus, Buddhist schoolchildren who wish to recite the Pledge with their classmates and affirm their loyalty to the United States are confronted with an ethical and spiritual dilemma each morning: On the one hand, to adhere to the teaching of "Right Speech," they should not pledge loyalty to a nation "under God." As explained above, the concept of God is irreconcilable with Buddhism. On the other hand, if a Buddhist child sincerely feels allegiance to this Republic and gratitude for the blessings of "liberty and justice," the principle of "Right Speech" would call upon him or her to recite the Pledge. It is spiritually problematic to stay mute rather than express heart-felt loyalties. Since Buddhists regard karmic actions as cumulative, the fact that the Pledge is recited daily magnifies the significance of this dilemma.

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[37] Rupert Gethin, *The Foundations of Buddhism* 81 (1998).

Congress may not have realized it in 1954 when it amended the Pledge to include "under God," but the mixing of patriotism with a Judeo-Christian religious concept creates a significant spiritual and ethical issue for Buddhist schoolchildren, their parents and their religious teachers.

II. DISCUSSION

A. Recitation of the Pledge of Allegiance in Public Schools Violates the Establishment Clause Because the Words "Under God" Favor and Endorse Monotheistic Religions.

The Pledge of Allegiance, codified at 4 U.S.C. § 4, is a pledge of loyalty "to the Flag of the United States of America, and to the Republic for which it stands . . . . " The words that follow this statement constitute an idealized self-portrait of the "Republic" that the American flag is declared to represent: "one Nation under God, indivisible, with liberty and justice for all." The Pledge thus presents an ideal vision of a country that embraces principles of liberty and justice and exists *"under God"* -- aligned with, watched over, blessed by, and/or answerable to, that monotheistic deity.

In deciding Establishment Clause cases, the Court has "often found it useful to inquire whether the challenged law or conduct has a secular purpose, whether its principal or primary effect is to advance or inhibit religion, and whether it creates an excessive entanglement of government with religion." *Lynch v. Donnelly*, 465 U.S. 668, 679 (1984) (citing *Lemon v. Kurtzman*, 403 U.S. 602 (1971)). As the Court has explained:

> The purpose prong of the *Lemon* test asks whether government's actual purpose is to endorse or disapprove of religion. The effect prong asks whether, irrespective of government's actual pur-

> pose, the practice under review in fact conveys a message of endorsement or disapproval. An affirmative answer to either question should render the challenged practice invalid.

Lynch, 465 U.S. at 690 (O'Connor, J., concurring). A review of the colloquy in the House and Senate recorded in the Congressional Record and other sources of the legislative history leaves absolutely no doubt that the "God" referred to in the Pledge is the Judeo-Christian "God," and the purpose of inserting "under God" into the pledge was to portray this as a Judeo-Christian, monotheistic country. The Pledge thus clearly violates the purpose as well as the effect prongs of the *Lemon* test. For example, Representative Rabaut, the House sponsor of the 1954 legislation stated: "Unless we are willing to affirm our belief in the existence of God and his creator-creature relations to man, we drop man himself to the significance of a grain of sand." 100 Cong. Rec. app. at A2527 (1954). In using the word "God," Congress did not mean "religiousness" in a general sense, or "spirituality" broad enough to encompass religions such as Buddhism. Congress was referring explicitly to *Jehovah*, the God of Christians and Jews. As Representative Rodino, author of one of the proposed House bills adding "under God" to the Pledge, explained: "Since the days of Constantine and his standard, 'In this sign [*i.e.*, the Cross] thou shalt conquer,' nations and governments have relied for their strength on trust in God. . . . Both officially and unofficially, the Government and people of America have recognized the necessity of doing the will of God as we see it." 100 Cong. Rec. 7763 (1954). It is difficult to imagine a clearer, more blatant violation of the *Lemon* test's purpose and effect prongs.[38]

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[38] The 1954 legislation that inserted "under God" into the Pledge was enacted at a time when Communism and Communist ideology were regarded as a grave threat to American values and institutions. But it was inaccurate then, as it is now, to divide the world into believers in God and atheistic non-believers, including those who embrace Communism. Over 300 million people around the world, including the thousands of Buddhist Americans whose temples and organizations are *Amici* on this brief, are deeply religious non-theistic Buddhists who neither believe in God nor characterize themselves as "atheists." Indeed, no religion has suffered more at the hands of Communism than Buddhism. From the murder of Buddhist monks and the destruction and looting of Tibet's ancient monasteries, to the genocide committed by the Pol Pot regime that controlled Cambodia from 1975 to 1979, to the wholesale destruction of Buddhist temples by Communist regimes in Laos and Vietnam, *non-theistic* Buddhists have been among the most terrorized and persecuted victims of *atheistic* Communism.

Whether or not the 1954 amendment would have been seen at the time to violate the Establishment Clause, as the Court has explained, Establishment Clause jurisprudence has changed over time to respond to the country's increasing religious diversity: "At one time it was thought that [the First Amendment] merely proscribed the preference of one Christian sect over another, but would not require equal respect for the conscience of the infidel, the atheist, or the adherent of a non-Christian faith such as Islam or Judaism." *Wallace v. Jaffree*, 472 U.S. 38, 52 (1985). That view obviously changed over time, as "the underlying principle has been examined in the crucible of litigation," *id.*, and the principle that the government may not prefer one religion over another has developed into the bedrock of Establishment Clause jurisprudence. "The clearest command of the Establishment Clause is that one religious denomination cannot be officially preferred over another." *Larson v. Valente*, 456 U.S. 228, 244 (1982). The principle that the Constitution prohibits the preference of a particular religion over another has been extended on several occasions to non-

theists, including Buddhists: "neither a State nor the Federal Government . . . can aid those religions based on a belief in the existence of God as against those religions founded on different beliefs." *Torcaso v. Watkins*, 367 U.S. 488, 495 (1961); *see also Cruz v. Beto*, 405 U.S. 319, 322 (1972):

> If [a prisoner] was a Buddhist and if he was denied a reasonable opportunity of pursuing his faith comparable to the opportunity afforded fellow prisoners who adhere to conventional religious precepts, then there was palpable discrimination by the State against the Buddhist religion, established 600 B. C., long before the Christian era.

The government must never show "a preference for one particular sect or creed." *County of Allegheny v. ACLU*, 492 U.S. 573, 605 (1989). Nor can the government "pass laws which aid one religion, aid all religions, or prefer one religion over another." *Lee*, 505 U.S. at 600 (Blackmun, J., joined by Stevens and O'Connor, JJ., concurring) (citing *Everson v. Bd. of Educ. of Ewing*, 330 U.S. 1 (1947)). When the government does prefer one religion over another, "there will almost always be some pressure to conform. 'When the power, prestige and financial support of government is placed behind a particular religious belief, the indirect coercive pressure upon religious minorities to conform to the prevailing officially approved religion is plain.'" *Id.* at 605 n.6 (quoting *Engel v. Vitale*, 370 U.S. 421, 431 (1962)). "When the government puts its *imprimatur* on a particular religion, it conveys a message of exclusion to all those who do not adhere to the favored beliefs." *Id.* at 606. "The suggestion that government may establish an official or civic religion as a means of avoiding the establishment of a religion with more specific creeds strikes us as a contradiction that cannot be accepted." *Id.* at 590. *See also Epperson v. Arkansas*, 393 U.S. 97, 103-04 (1968) ("The First Amendment mandates governmental neutrality between religion and religion, and between religion and nonreligion.").

The addition of "under God" into the Pledge in 1954 was a constitutional mistake – the product of an inflamed political time when Congress saw geopolitical advantage in making religious belief, and Judeo-Christian religious belief in particular, an official element of American self-definition. In doing so, Congress violated the "clearest command of the Establishment Clause" and created legislation preferring "one religious denomination," *i.e.*, Judeo-Christian monotheism, "over another," *i.e.*, non-theistic religions such as Buddhism. *Larson v. Valente*, 456 U.S. 228, 244 (1982). The 1954 Act put the government's "*imprimatur* on a particular religion," transforming the Pledge's original secular vision of a country that exalts liberty and justice into a vision of a country aligned with the Judeo-Christian God. *Lee*, 505 U.S. at 606 (Blackmun, J., joined by Stevens and O'Connor, JJ., concurring). The Act thus made monotheism the "officially approved religion" for our country. *Id.* at 605 n.6.

It might be argued that "God" is a very broad term, with multiple definitions, and that although the intent of those who passed the 1954 Act was to portray a Judeo-Christian country, adherents to other religions should not be uncomfortable with the concept of a nation "under God." Such an argument, however, asks schoolchildren to accommodate "the mixing of government and religion." *Id.* at 606. It is an accommodation that Buddhist schoolchildren cannot make in any event because there is *no* construction of the word "God" that would encompass Buddhist beliefs.

When Buddhist schoolchildren recite the words describing this as a nation "under God," they voice the name of a deity from a particular religious tradition that is different from their own, they articulate a religious concept that is inconsistent with their religion, they violate the ethical

teaching prohibiting untrue utterances, and they exalt a concept that clashes with the "awakening to supreme wisdom" that is their religion's very goal.

B. Recitation of the Pledge of Allegiance in Public Schools Violates the Establishment Clause Because it Forces Buddhist Schoolchildren to Choose Between Violating Their Religious Beliefs or Being Stigmatized as Unpatriotic.

The Court has long held that there is a pronounced and particular risk of coercion in the school environment. *See, e.g., Lee v. Weisman*, 505 U.S. 577, 592 (1992) ("What to most believers may seem nothing more than a reasonable request that the nonbeliever respect their religious practices, in a school context may appear to the nonbeliever or dissenter to be an attempt to employ the machinery of the State to enforce a religious orthodoxy."); *Santa Fe Indep. Sch. Dist. v. Doe*, 530 U.S. 290, 315-17 (2000). Schoolchildren are impressionable and highly susceptible to influence exerted upon them. Members of this Court have recognized that the State wields great power over students through mandatory attendance requirements. *City of Elkhart v. Books*, 532 U.S. 1058, 1061 (2001) (Rehnquist, C.J., joined by Scalia and Thomas, JJ., dissenting from denial of certiorari). Other members of this Court have recognized that school officials who convey an endorsement of religion "strike near the core of the Establishment Clause." *Lee*, 505 U.S. at 631 (Souter, J., joined by Stevens and O'Connor, JJ., concurring). As the Court has noted, the heightened sensitivity of children with respect to Establishment Clause issues is due in part to the combination of social and peer pressures. *Id.* at 593-94. In the context of the Establishment Clause, compulsion is not limited to pressure by force or requirement, and includes situations in which students must choose between participating or protesting. *Id.* at 596. Students are impermissibly coerced when a school officially

approves of a religious exercise, whether or not participation is voluntary. *Santa Fe*, 530 U.S. at 311-12; *see also Sch. Dist. of Abington v. Schempp*, 374 U.S. 203 (1963). If there is any arena in which constitutional limitations upon the actions of State actors must be rigorously enforced, it is the classroom.

The Pledge is neither "ceremonial," nor an educational lesson about the country's religious heritage. It is a *pledge*, a statement of commitment that students are expected to recite aloud each morning, with hand over heart, in unison with their classmates. When a teacher leads a class in reciting the Pledge, the State poses a dilemma for Buddhist schoolchildren who wish to say the Pledge with their classmates. That dilemma – that these students must either say the Pledge and invoke a religious concept at odds with their faith, or refrain from pledging their allegiance to the flag of their country and the ideals the flag represents – amounts to an unconstitutional act of coercion under *Lee* and *Santa Fe*. "The Establishment Clause prohibits government from making adherence to a religion relevant in any way to a person's standing in the political community." *Lynch v. Donnelly*, 465 U.S. 668, 687 (1984) (O'Connor, J., concurring). It is constitutionally unacceptable that these children must choose between following the lead of their school teachers or being faithful to their religion.

Compounding the constitutional offense, when the Pledge is recited in public school classrooms each morning, Buddhist students throughout the land are reminded that the official version of our country's patriotic oath proclaims and exalts a religion that is different from their own. The message conveyed by the State, through a ritual led by teachers, is that Buddhist students "are outsiders, not full members of the political community, and [there is] an accompanying message to adherents that they are insiders, favored members of the political community." *Santa Fe*, 530 U.S. at

309-10 (quoting *Lynch v. Donnelly*, 465 U.S. 668, 688 (1984) (O'Connor, J., concurring)).

Even if the Constitution is not deemed to require complete separation of church and State, "it affirmatively mandates accommodation, not merely tolerance, of all religions, and forbids hostility toward any." *Lynch v. Donnelly*, 465 U.S. 668, 673 (1984). Placing the children of a non-theistic religion in a position where participating in the Pledge requires them to proclaim an idealized Judeo-Christian republic is *not* an accommodation. To the contrary, it approaches hostility toward Buddhist beliefs. The alternative of "asking" children to stand mute as their peers recite the Pledge can hardly be viewed as tolerance.

Especially now, when public authorities are re-emphasizing the importance of patriotism and national unity in the face of new threats from new enemies, Buddhist schoolchildren should not be inhibited from expressing their loyalty to their country by reciting words that conflict with their religious beliefs, nor should they be coerced to sacrifice their religious beliefs in order to participate in an important patriotic ritual.

C. Recitation of the Pledge of Allegiance to a Nation "Under God" in Public Schools Cannot be Excused as "Ceremonial Deism."

The Court has commented in dicta that certain official references to the Judeo-Christian God may be constitutionally permissible, such as "appeals to the Almighty in the messages of the Chief Executive; the proclamations making Thanksgiving Day a holiday; [and] 'so help me God' in our courtroom oaths." *Zorach v. Clauson*, 343 U.S. 306, 312-13 (1952). And, the Court held in *Marsh v. Chambers*, 463 U.S. 783 (1983), that the Nebraska legislature's practice of beginning its sessions with a prayer delivered by a State-paid chaplain did not violate the Establishment Clause. The

rationale offered by the Court for such government references to religion is that they serve a "ceremonial" purpose, and that in these settings, an "acknowledgment of religion . . . 'serve[s], in the only wa[y] reasonably possible in our culture, the legitimate secular purposes of solemnizing public occasions, expressing confidence in the future, and encouraging the recognition of what is worthy of appreciation in society.'" *County of Allegheny v. ACLU*, 492 U.S. 573, 595 (1989) (quoting *Lynch*, 465 U.S. at 693 (O'Connor, J., concurring)).

Petitioners, the United States, and several *Amici* supporting Petitioners have asserted that the reference to "God" in the Pledge serves a similar "ceremonial" purpose, that the reference to God has lost its religious significance, and that in any event, it is a "harmless" continuation of an American "tradition." They are wrong on all scores.

First, a chaplain's short prayer at the commencement of a legislative session, or a bailiff's declaration that God should bless our country and the court, do not contemplate that those in attendance will voice aloud their own commitment to the God that is being invoked. Rather, they are asked only to be respectful. Indeed, to the extent that legislative prayer simply serves a ceremonial purpose, we might imagine that some day, especially in areas with a large number of Buddhist voters, Buddhists may join priests, ministers, and rabbis in opening legislative sessions. In *Marsh*, the record indicated that the Nebraska legislature's chaplain had adopted the practice of invoking the name of Jesus Christ during his prayers, but he ceased doing so after a Jewish legislator complained. *Marsh*, 463 U.S. at 793 n.14. In *Marsh*, moreover, the Court emphasized that the claimant was an adult and therefore "presumably not readily susceptible to 'religious indoctrination.'" *Id.* at 792 (quoting *Tilton v. Richardson*, 403 U.S. 672, 686 (1971)). Students in public schools – who wish to please their teachers, earn

good grades, and are prone to peer and social pressure – are highly susceptible to "religious indoctrination" and being pressured into invoking a God that is incompatible with their religious beliefs.

Second, to say that the words "under God" have lost their religious significance because of repetition is belied by the storm of protest that the Ninth Circuit's decision provoked. Such a view insults those Americans for whom God is a central and foundational part of their lives, and ignores the very reason it was added in the first place – in President Eisenhower's words, so that schoolchildren would henceforth "proclaim in every city and town, every village and rural schoolhouse, the dedication of our Nation and our people to the Almighty." 100 Cong. Rec. 8618 (1954). To say that *any* reference to "God" – in particular, one that is in a *pledge* -- can have a *de minimis* character, is an affront to adherents:

> [T]he embarrassment and the intrusion of the religious exercise cannot be refuted by arguing that these prayers, and similar ones to be said in the future, are of a *de minimis* character. To do so would be an affront to the rabbi who offered them and to all those for whom the prayers were an essential and profound recognition of divine authority.

Lee, 505 U.S. at 594. *See also Wallace v. Jaffree*, 472 U.S. 38, 60 (1985) ("The importance of that principle [of complete governmental neutrality toward religion] does not permit us to treat this as an inconsequential case involving nothing more than a few words of symbolic speech on behalf of the political majority.").

Third, the 1954 version of the Pledge does not represent a "tradition" dating to colonial times that is woven into our country's history, nor is there any historical evidence to

support its constitutionality. From its original formulation by Francis Bellamy (himself an ordained Baptist minister) in 1892, to its adoption in 1942 during the early stages of World War II, the Pledge was purely secular in its content and purpose and simply proclaimed that we are "one Nation, indivisible, with liberty and justice for all." As discussed above, it was not until the Cold War, and the perceived need to use religion to distinguish the United States from atheistic communism, that religious groups succeeded in their efforts to inject into the Pledge an invocation of the Judeo-Christian God.

Finally, the "ceremonial Deism" cases embrace a misperception that being "religious" is synonymous with a belief in "God" or similar "Supreme Being." For example, in *Marsh*, the Court repeated its earlier observation that "[w]e are a religious people whose institutions *presuppose a Supreme Being*." *Marsh*, 463 U.S. at 792 (emphasis added) (quoting *Zorach*, 343 U.S. at 313). For Buddhist schoolchildren, being religious does *not* "presuppose a Supreme Being" but embraces religious concepts that are incompatible with the existence of such a Being. For Buddhist schoolchildren, the invocation of "God" does *not* suggest religion as such but refers to the deity of a particular monotheistic tradition.

CONCLUSION

Because a religious concept incompatible with their beliefs was injected into the Pledge of Allegiance, Buddhist schoolchildren must choose each morning between reciting the Pledge with their classmates or adhering to their religious beliefs; voicing their patriotism, or revering their religious heritage; following the lead of their teachers, or the religious teachings of their parents. They should not have to make such choices. If the Establishment Clause means anything, it is that loyalty to this country requires allegiance to the freedoms we cherish, and patriotism must never be conditioned on the expression of a particular religious belief.

For the foregoing reasons, the judgment below should be affirmed.

Respectfully submitted,

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APPENDIX

DESCRIPTION OF AMICI

- **Billings Dharma Center**. The Billings Dharma Center is a Buddhist community meeting in Billings, Montana since 1980.

- **Blue Mountain Lotus Society**. The Blue Mountain Lotus Society, based in Harrisburg, Pennsylvania, is devoted to sharing the universal teachings of the Buddha in the 21st century. While having roots in the Buddhist traditions of India, China and Japan, the Blue Mountain Lotus Society adheres to a distinctly American school of Buddhism that embraces aspects of the Zen and Shin teachings.

- **Border Zen Center**. The Border Zen Center is a community of Soto Zen Buddhists based in El Paso, Texas.

- **Cleveland Buddhist Temple**. The Cleveland Buddhist Temple is a member of the Buddhist Churches of America and is the oldest continuously meeting Buddhist Organization in the State of Ohio. Although founded by Japanese Americans after their release from internment camps following World War II, its membership now also includes Americans who are not of Japanese descent.

- **Ekoji Buddhist Temple**. The Ekoji Buddhist Temple, Fairfax Station, Virginia, was founded in 1981 and is affiliated with the Hongwanji-ha Buddhist denomination. The Hongwanji-ha denomination is a worldwide Buddhist fellowship with members in the Americas, Europe, Asia, Australia, and Africa.

- **A Few Simsapa Leaves Buddhist Center**. A Few Simsapa Leaves Buddhist Center is a Theravada Buddhist group based in Walla Walla, Washington.

• **Fresh Breeze Mindfulness Sangha**. The Fresh Breeze Mindfulness Sangha, Baltimore, Maryland, is a community of Buddhists in the Baltimore, Maryland area who adhere to the teachings of the Vietnamese Buddhist leader, Thich Nhat Hanh.

• **Greater Boston Buddhist Cultural Center**. The Greater Boston Buddhist Cultural Center, Boston, Massachusetts, is a branch of the Fo Guang Shan Monastery in Taiwan, which has 200 worldwide affiliates.

• **Honpa Hongwanji Hawaii Betsuin Temple**. The Honpa Hongwanji Hawaii Betsuin Temple in Honolulu, Hawaii, is the flagship branch temple of the Honpa Hongwanji Mission of Hawaii, a 110-year old Buddhist organization based in Hawaii. The first Hongwanji temple in Hawaii was dedicated on March 3, 1889 and there are presently 36 Honpa Hongwanji temples in the State of Hawaii.

• **Kurukulla Center for Tibetan Buddhist Studies**. The Kurukulla Center for Tibetan Buddhist Studies, Medford, Massachusetts, founded in 1989, is the Boston area chapter of the Foundation for the Preservation of the Mahayana Tradition (FPMT), a worldwide network of over 120 Tibetan Buddhist centers, healing and retreat centers, monasteries, nunneries, and publishing houses.

• **LamRim Buddhist Center**. The LamRim Buddhist Center in Chestnut Hill, Massachusetts, is a religious and educational organization that provides Tibetan Buddhist philosophy classes and other special events.

• **Mansfield Zen Sangha**. The Mansfield Zen Sangha is a Zen Buddhist Community based in Mansfield, Ohio.

• **Nebraska Zen Center**. The Nebraska Zen Center is a Soto Zen Buddhist Temple in Omaha, Nebraska. The Center was founded in 1975.

• **Nipponzan Myohoji - Atlanta Dojo**. Nipponzan Myohoji - Atlanta Dojo is the Atlanta, Georgia, temple of the Nipponzan Myohoji Buddhist religious order. Nipponzan Myohoji is an international Buddhist organization, widely known for their construction of Peace Pagodas throughout the world.

• **Ozark Zen Center**. The Ozark Zen Center is a lay Buddhist community based in Fayetteville, Arkansas, affiliated with the Zen Buddhist Order of Hsu Yun.

• **Palo Alto Buddhist Women's Association**. The Palo Alto Buddhist Women's Association, Palo Alto, California, is an affiliated organization of the Palo Alto Buddhist Temple, founded in the 1920's. It is a member of the World Federation of Buddhist Women's Associations, the National Federation of Buddhist Women's Associations and the Bay District Buddhist Women's League.

• **Seabrook Buddhist Temple**. The Seabrook Buddhist Temple, Seabrook, New Jersey, traces its origins to 1945 when approximately 500 families of Japanese ancestry settled in the area. The Seabrook Buddhist Temple is affiliated with the Buddhist Churches of America.

• **Soka Gakkai International (SGI)-USA**. Soka Gakkai International (SGI)-USA is an American Buddhist association that promotes world peace and individual happiness based on the teachings of the Nichiren school of Mahayana Buddhism. The SGI organization in the United States was officially established in 1960. The U.S. organization has grown to a multi-ethnic membership of 330,000, with members in every state and with more than 87 community centers around the country. SGI-USA is affiliated with the worldwide SGI organization that has more than 12 million members in more than 180 countries and territories, with its headquarters in Tokyo, Japan.

• **Unitarian Universalist Buddhist Fellowship.** The Unitarian Universalist Buddhist Fellowship is a national independent affiliate of the Unitarian Universalist Association, comprised of clergy and lay people who have an interest in both Buddhism and Unitarian Universalism. Unitarian Universalist Buddhist Fellowship groups promote a better understanding of Buddhism within Unitarian Universalism and there are Unitarian Universalist Buddhist Groups in over 70 Unitarian Universalist congregations in the United States.

• **Unitarian Universalist Buddhist Group of Richmond**. The Unitarian Universalist Buddhist Group is a Buddhist community affiliated with the First Unitarian Church of Richmond, Virginia.

• **Village Zendo**. Village Zendo is a Soto Zen Buddhist community based in New York, New York and is affiliated with the Zen Peacemaker Circle and the Buddhist Peace Fellowship.

• **Wat Washington Buddhavanaram and Wat Richland Buddhavanaram**. Wat Washington Buddhavanaram, Auburn, Washington, and Wat Richland Buddhavanaram, Richland, Washington, are Theravada Buddhist temples with over 800 members.